

May 31, 2022

CM/ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl St., Room 701
New York, NY 10007

Re: Lohnn v. International Business Machines Corporation, No. 1:21-cv-06379-LJL

Dear Judge Liman:

Plaintiff Denise Lohnn (Executor of the Estate of Jorgen Lohnn, Deceased) and Defendant International Business Machines Corporation (“IBM”) jointly submit this status report. On March 31, 2022, the parties requested that the Court stay this matter to assist the parties in finalizing their tentative resolution and help secure a voluntary dismissal of the matter. (Dkt. No. 63.) On April 1, 2022, the Court granted the parties’ request. (Dkt. No. 64.) On April 29, 2022, the parties jointly requested a continuation of the stay until May 31, 2022, which the Court granted on April 29, 2022 (Dkt. No. 66).

The parties continue to make progress toward a final resolution and request that the current full stay of the above-captioned proceeding remain in place. Because IBM’s appeal to the Second Circuit of the Court’s January 4, 2022 Order (Dkt. No. 42) is stayed until July 1, 2022 (*see* Ex. A), the parties jointly request that this Court likewise continue to stay this matter until July 1, 2022. By July 1, 2022, the parties will file either a stipulation of dismissal or a status report.

If this joint request for continuation of the stay meets with Your Honor’s approval, a “So Ordered” line is provided below for the Court’s convenience.

Hon. Lewis J. Liman
May 31, 2022
Page 2

Respectfully submitted,

s/ Shannon Liss-Riordan

Shannon Liss-Riordan
Counsel for Plaintiffs

s/ Matthew W. Lampe

Matthew W. Lampe
Counsel for Defendant

IT IS SO ORDERED.

DATED: _____

Hon. Lewis J. Liman
United States District Judge